

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

STEPHEN H. SOKOLOWSKI and  
CHRISTOPHER H. SOKOLOWSKI,  
  
Plaintiffs  
  
- against -  
  
DIGITAL CURRENCY GROUP, INC.,  
BARRY E. SILBERT, and SOICHIRO  
“MICHAEL” MORO,  
  
Defendants.

Electronically Filed

Civil Action No. 4:25-cv-00001

Hon. Karoline Mehalchick

Amended Complaint filed  
March 25, 2025

**UNCONTESTED MOTION OF DEFENDANTS  
DIGITAL CURRENCY GROUP, INC. AND BARRY E. SILBERT  
FOR EXTENSION OF TIME TO REPLY TO PLAINTIFF’S BRIEF IN  
OPPOSITION TO THEIR MOTION TO DISMISS**

Defendants Digital Currency Group, Inc. and Barry E. Silbert, (hereinafter the “Moving Defendants”), hereby move the Court for an extension of time until July 1, 2025 to file their reply to plaintiffs’ brief in opposition to their motion to dismiss, and in support thereof aver as follows:

1. The undersigned represents the Moving Defendants in this action alleging claims under the Pennsylvania Unfair Trade Practices and Consumer Protection Law.
2. On April 8, 2025, the Moving Defendants filed the Motion of Digital Currency Group, Inc. and Barry E. Silbert to Dismiss Plaintiffs’ Amended Complaint (Doc. 25) (the “DCG/Silbert Motion to Dismiss”). On the same date,

Defendant Soichiro “Michael” Moro also filed a motion to dismiss Plaintiffs’ Amended Complaint (Doc. 24) (the “Moro Motion to Dismiss,” and together with the DCG/Silbert Motion to dismiss, the “Motions to Dismiss”).

3. The Moving Defendants filed a Memorandum of Law in Support of the DCG/Silbert Motion to Dismiss (Doc. 37) on April 22, 2025, and Defendant Moro filed a Memorandum of Law in Support of the Moro Motion to Dismiss (Doc. 28) on April 23, 2025.

4. On May 7, 2025, this Court granted Plaintiffs’ unopposed motion for an extension of time to respond to Defendants’ Motions to Dismiss (Doc. 41). Plaintiffs sought and the Moving Defendants provided their consent to this relief.

5. On May 23, 2025, the Court granted Plaintiffs’ motion to submit a consolidated brief in opposition to Defendants’ Motions to Dismiss not to exceed 15,000 words. (Doc. 43.) Defendants took no position on this relief.

6. On May 27, 2025, plaintiffs filed a Memorandum of Law in Opposition to Defendants’ Motion to Dismiss (Doc. 44) (“the Opposition”). Plaintiffs’ Opposition spans 73 pages and contains seven principal argument sections, with 41 subsections.

7. The Moving Defendants have conferred with Plaintiffs by email and Plaintiffs do not object to Moving Defendants’ request.

8. The Moving Defendants have not previously sought an extension of any deadlines in this case.

WHEREFORE, the Moving Defendants respectfully request that this Honorable Court grant the within Motion extend the deadline for Moving Defendants' reply brief by 21 days, to July 1, 2025.

Respectfully submitted,

DAVIS POLK & WARDWELL LLP

By /s/ Benjamin S. Kaminetzky  
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– and –

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*Attorneys for Defendants Digital  
Currency Group, Inc. and Barry E.  
Silbert*

## CERTIFICATE OF SERVICE

I hereby certify that the attached *Uncontested Motion of Defendants Digital Currency Group, Inc. and Barry E. Silbert for Extension of Time to Reply to Plaintiffs' Brief in Opposition to Their Motion to Dismiss*, was electronically filed with the court and electronically served upon all counsel on June 5, 2025.

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